IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TENNESSEE

SNMP RESEARCH, INC. and SNMP Case No. 3:20-cv-00451 RESEARCH INTERNATIONAL, INC., Plaintiffs, **Jury Demand** v.

BROADCOM INC.; BROCADE COMMUNICATIONS SYSTEMS LLC: AND EXTREME NETWORKS, INC.

Defendants.

PLAINTIFF SNMP RESEARCH, INC.'S MOTION TO COMPEL DISCOVERY **RESPONSES**

COMES NOW Plaintiff SNMP Research, Inc. ("SNMP Research" or "Plaintiff") and, in accordance with Rules 26, 33, 34, 36, and 37 of the Federal Rules of Civil Procedure, this Court's inherent authority to control the conduct of discovery, the Local Rules of this Court and Plaintiff's Memorandum of Law submitted contemporaneously herewith, move this Court to Compel Discovery Responses from Defendants Broadcom Inc. ("Broadcom") and Brocade Communications Systems LLC ("Brocade", collectively with Broadcom, "Defendants").

- 1. On December 26, 2020, Plaintiff served written discovery on Defendants.
- 2. As of the date of this Motion Defendants have not provided any substantive responses or even a single document in response to any discovery request despite Defendants promise to do so.
- 3. Defendants' conduct flouts Defendants' obligations under the Federal Rules of Civil Procedure. Plaintiff is prejudiced in the prosecution of its claims by Defendants' conduct and refusals.
- 4. In support of this Motion, Plaintiff submits the accompanying Plaintiff's Memorandum of Law and Declaration of Olivia Weber.

WHEREFORE, for the reasons set forth above, and as are set forth in Plaintiff's Memorandum

of Law in support of its Motion to Compel Discovery Responses, and upon the grounds as shall be raised at oral argument of this Motion (if any), Plaintiff asks this Court to enter an order compelling Defendants to respond to all of the outstanding discovery propounded by Plaintiff without further delay. Plaintiff also ask this Court to grant it any additional and further relief to which the Court determines Plaintiff is entitled under applicable authority.

Respectfully submitted,

Dated: September 13, 2021 By: /s/ John L. Wood

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Dated: September 13, 2021 By: /s/ A. Matthew Ashley

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